



COUNCILMEMBER SHERRI S. LIGHTNER

FIRST DISTRICT
CITY OF SAN DIEGO

February 8, 2010

Dustin Fuller, Sr. Environmental Planner
22nd District Agricultural Association
Del Mar Fairgrounds
2260 Jimmy Durante Boulevard
Del Mar, CA 92014-2216

Via Facsimile: 858-755-7820

Via email: MasterPlanEIR@sdfair.com

Dear Mr. Fuller:

Thank you very much for the opportunity to provide comments on the Draft Environmental Impact Report (DEIR) for the Del Mar Fairgrounds Master Plan. We appreciated your willingness to extend the public comment period to allow additional time for all interested parties to review and comment on this important document.

I look forward to the responses from the 22nd District Agricultural Association (DAA) to the comments made on the DEIR, particularly those submitted by the San Dieguito River Valley Park – Joint Powers Authority, SANDAG, the City of Del Mar, the City of San Diego and the City of San Diego's community planning groups for the Torrey Pines and Carmel Valley planning areas – all of which will be affected by implementation of the proposed Master Plan.

I have some general concerns about the Master Plan and its goals and alternatives, the use of the DEIR as a project-level and programmatic-level document, and some specific concerns about a number of statements in the DEIR.

My concern with the Master Plan goals and the proposed implementation is that the near term projects of the Master Plan are designed to increase revenue for the 22nd DAA at the expense of the local community's economy and quality of life.

From p.3-11 of the DEIR, "the following are (some of) the near-term objectives of the Master Plan:

1. Develop facilities and operational programs that have a synergistic economic benefit for the Fairgrounds and for adjacent communities.



3. Provide visitor-serving uses on the Fairgrounds site that address the needs of participants and patrons who require overnight stays in order to enable the successful operation of major events.
4. Enhance the Fairgrounds' attractiveness to conference planners by providing sufficient on-site hotel accommodations, dining facilities, and modern exhibit hall space to support multiday conference/convention events.
5. Implement improvements at the Fairgrounds that will enhance the economic self-sustainability of the Fairgrounds by attracting a variety of events and users.

Goals 1, 3 and 4 are interrelated and if achieved will negatively affect adjacent communities. Economic impacts do not need to be included in the environmental evaluation, yet the creation of the condo (timeshare) hotel will have a negative effect on the local, seasonal rental market. Has this been quantified? In particular, what is the availability of rooms/accommodations off-site, and will the 22nd DAA be competing with local businesses?

Will revenue generated on the Fairgrounds' site be shared with the local jurisdictions? In particular, I believe there is no property tax, but where is the sales tax allocated? How much does the 22nd DAA contribute to police, fire-rescue, EMS, and local infrastructure? How are the new Fairground projects to be financed? Will the operator of all of the new projects be the 22nd DAA or a subcontractor?

From p. 3-8 of the DEIR "The Del Mar Fairgrounds is a self-sufficient facility." Please explain what this means and how it relates to the above goal #4. Is a self-sufficient facility different from one which is economically self-sustaining? Does this mean that goal #5 has already been achieved?

The statement that the Master Plan is not inconsistent with the local community plans, local coastal programs and land use plans is clearly not the same as saying that it is consistent with the local land use plans and local coastal programs – in particular, the City of San Diego zoning would not allow use of the east parking lot as a paved or permeable lot for cars, since its zoning in the City is OP 1-1. (p.4.1-56 "While the City of San Diego OP-1-1 zone does not permit the use of the site for the primary use of parking [3200 spaces]...Furthermore, while some of the uses on the Fairgrounds' parcels are consistent with City of San Diego Chapter 13 zoning, as a State agency, the 22nd DAA's property is not subject to local zoning and retains jurisdictional authority over use and activities within the Fairgrounds.")

Is the 22nd DAA in compliance with the enforcement action on the parking lot from 1990? Are there any other enforcement actions related to the operation of the Fairgrounds by the 22nd DAA?

The proposed Master Plan will result in the addition of jobs (p. 4.10-7, "413 full-time equivalent (FTE) employees at the hotel and 30 FTE employees at the Health Club/Sports Training Facility) – where will the employees live and park, and what transit options will be available?

In addition, I would like to request clarification on some of the statements made in the DEIR.

p. 3-41 "...roof area of the exhibit areas for community field sports and special functions." What does this mean? It appears as if there are three lighted soccer fields on the roof of the exhibit areas for "community field sports." Please define "community," and explain if these fields will be available to the local community, or will they be used for regional or larger competitions? What would be the traffic impacts associated with such events?

p. 3-53 "[T]he Health/Club/Sports Training Facility includes 110 spaces" of the 300 required for the use. However, the parking requirements of the Golf Center are not included in either the 110 or the 300 parking spaces mentioned. The balance of the 300 spaces will be cordoned off by the 22nd DAA staff in the East Parking Lot during major events.

How many spaces are required for the Golf Center and the existing tennis courts, and where are they located? Since the facility is to be used for "uses such as baseball and soccer camps," are there additional parking requirements?

Demolition – How many square feet are to be demolished, what is the debris volume and how much of this will be recycled?

p. 3-63 Seasonal Train Platform. Transit access to the site should be accomplished before any other projects are approved. This could be done in a number of ways, including a seasonal train platform, enhanced bus service and connections to existing transit. Please explain the statement on p. 4.12-4 that "NCTD's BREEZE bus (Route 101) provides 180 daily trips that serve the project site." This number of trips to the project site seems high.

The seasonal transit platform is needed to mitigate events on site now and should be implemented before any other demolition or construction on site.

Is ADA accessibility – especially with respect to Transit discussed?

p. 4.1-37 "the proposed location for the new fire station is not currently owned by the 22nd DAA or the City of Del Mar; therefore, the 22nd DAA would be required to make arrangements for the acquisition of the site and construct a new fire station prior to the demolition of the existing fire station (Mitigation Measure 4.1.3)."

Will this be an eminent domain type of action? The elimination of almost an acre of commercially-zoned property in the fully built-out City of Del Mar (p. 4.10-1, "The City [Del Mar] is largely developed, with little vacant land available to accommodate new construction.") will have a negative effect. Is there proposed mitigation?

What equipment does the local fire station have, and will the addition of taller residential style buildings (the 330 room, four-story condo hotel and 18,000 sq. ft. ballroom) on the Fairgrounds site require additional fire equipment, different types of fire-rescue equipment and evacuation tools?

p. 4.1-35 "Mitigation Measure 4.1.6 also requires the 22nd DAA to prepare a Construction Management Plan (CMP) for each Master Plan demolition and/or construction project. Please

provide a sample CMP and identify the staging area(s) for construction equipment and workers for each of the projects. Who reviews/approves CMP's, and is the local community involved? There should be no queuing along public rights of ways, no idling of trucks on the streets and mitigation for any damage caused to the local infrastructure by heavy equipment.

p. 4.1-81 - Mitigation Measure 4.1.6 - Will there be off-site impacts resulting from "normal on-site activities" that are relocated to accommodate on-site construction or demolition? If so, how will they be mitigated?

p. 4.11-53 "...there are no groundwater wells or pumping activities proposed for the project site other than as needed for temporary dewatering during the construction of subsurface structures." Is there any need to dewater the new, "semi underground" garages and how is water intrusion into the new garages to be contained and/or treated?

Will water catchment basins be used to collect roof water for landscaping use? Is dry weather vs. wet weather drainage treated differently for all areas of the Fairgrounds?

In the DEIR there is no proactive proposal to deal with sea level rise and the proposed project's location of new construction in the floodplain is supposedly not a problem, because the new footprint will be the same as the old footprint.

What is the amount of grading/fill on site?

Hotel plans given in Appendix L have no dimensions and are not shown with dimensions in relation to the site. Please provide more specificity, since this is part of the project level EIR.

Please do not hesitate to contact me at (619) 236-6611 or sherrilightner@sandiego.gov if I can provide additional information or clarification on any of my comments.

Sincerely,

A handwritten signature in black ink, reading "Sherri S. Lightner". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Sherri S. Lightner
Councilmember, First District
City of San Diego